IN THE UNITED STATES DISTRICT COURT EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA)
v.) The Honorable Liam O'Grad
KIM DOTCOM, et al.,) Criminal No. 1:12-CR-3
Defendants)

MOTION OF SIDLEY AUSTIN LLP AND THE ROTHKEN FIRM FOR LEAVE TO ENTER LIMITED APPEARANCE ON BEHALF OF MEGAUPLOAD LIMITED AND KIM DOTCOM

Non-parties Sidley Austin LLP and the Rothken Firm, on their own behalf, respectfully move this Court for leave (1) to enter limited appearances on behalf of Defendants Megaupload Limited and Kim Dotcom for purposes of (a) filing a motion under *United States v*. *Farmer*, 274 F.3d 800 (4th Cir. 2001), and (b) seeking to preserve evidence critical to the defense of this case, including by filing a response to the motion for a protective order filed by Carpathia Hosting, Inc., and (2) to withdraw their limited appearances at their option after the Court's resolution of the *Farmer* motion.

The grounds supporting this Motion are stated with particularity in the concurrently filed Memorandum in Support of the Motion of Sidley Austin LLP and the Rothken Firm for Leave to Enter Limited Appearance on Behalf of Megaupload Limited and Kim Dotcom.

A proposed order is attached.

Respectfully submitted,

/s/ Griffith L. Green_

Thomas C. Green
Griffith L. Green (VSB # 38936)
Edward R. McNicholas
SIDLEY AUSTIN LLP
1501 K Street N.W.
Washington, D.C. 20005
(202) 736-8000
(202) 736-8711 (fax)
tcgreen@sidley.com
ggreen@sidley.com

Ira P. Rothken THE ROTHKEN FIRM 3 Hamilton Landing Suite 280 Novato, CA 94949 (415) 924-4250 (415) 924-2905 (fax) ira@techfirm.net

Counsel for Sidley Austin LLP and the Rothken Firm

Dated: March 30, 2012

CERTIFICATE OF SERVICE

I hereby certify that on March 30, 2012, the foregoing Motion of Sidley Austin LLP and the Rothken Firm for Leave to Enter Limited Appearance on Behalf of Megaupload Limited and Kim Dotcom was filed and served electronically by the Court's CM/ECF system upon all registered users, and by first-class mail, postage prepaid, upon the following:

Jay V. Prahbu Robert W. Wiechering United States Attorney's Office Eastern District of Virginia Justin W. Williams U.S. Attorney's Building 2100 Jamieson Avenue Alexandria, Virginia 22314

/s/ Griffith L. Green
Griffith L. Green (VSB # 38936)